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9 **UNITED STATES DISTRICT COURT**  
10 **NORTHERN DISTRICT OF CALIFORNIA**  
11 **SAN FRANCISCO DIVISION**

12 IN RE: UBER TECHNOLOGIES, INC.,  
13 PASSENGER SEXUAL ASSAULT  
14 LITIGATION

MDL No. 3084 CRB

15 This Document Relates to:

Honorable Charles R. Breyer

16 *M.A. v. Uber Technologies, Inc., et al.*

JURY TRIAL DEMANDED

17 Case No. 3:24-cv-02568-CRB

18  
19 **FIRST AMENDED SHORT-FORM COMPLAINT**  
20 **AND DEMAND FOR JURY TRIAL**

21 The Plaintiff named below files this *First Amended Short-Form Complaint and*  
22 *Demand for Jury Trial* against Defendants named below by and through the undersigned  
23 counsel. Plaintiff incorporates by reference the allegations contained in *Plaintiffs' Master*  
24 *Long-Form Complaint* in *In Re: Uber Technologies, Inc., Passenger Sexual Assault*  
25 *Litigation*, MDL No. 3084 in the United States District Court for the Northern District of  
26 California. Plaintiff files this *First Amended Short-Form Complaint* as permitted by Case  
27 Management Order No. 6 of this Court.  
28

Plaintiff selects and indicates by checking-off where requested, the Parties and Causes of Actions specific to this case.

Plaintiff, by and through their undersigned counsel, allege as follows:

**I. DESIGNATED FORUM<sup>1</sup>**

1. Identify the Federal District Court in which the Plaintiff would have filed in the absence of direct filing:

Northern District of California

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("Transferee District Court")

**II. IDENTIFICATION OF PARTIES**

**A. PLAINTIFF**

1. *Injured Plaintiff*: Name of the individual who alleges they were sexually assaulted, battered, harassed, or otherwise attacked by an Uber driver with whom they were paired while using the Uber platform:

M.A., an individual

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("Plaintiff")

2. At the time of the filing of this *Short-Form Complaint*, Plaintiff resides at: Olmsted, Cuyahoga County, OH
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3. (If applicable) \_\_\_\_\_ [INSERT NAME OF REPRESENTATIVE] is filing this case in a representative capacity as the [INSERT DESCRIPTOR IE ADMINISTRATOR] of the [INSERT DESCRIPTOR IE ESTATE NAME, ETC], and has authority to act in this representative capacity because [INSERT BASIS FOR AUTHORITY].

**B. DEFENDANT(S)**

1. Plaintiff names the following Defendants in this action.

☒ UBER TECHNOLOGIES, INC.,<sup>2</sup>

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<sup>1</sup> See Pretrial Order No. 6, at II(C) (ECF No. 177).

<sup>2</sup> Delaware corporation with a principal place of business in California.

☒ RASIER, LLC,<sup>3</sup>

☒ RASIER-CA, LLC.<sup>4</sup>

☐ OTHER (specify):\_\_\_\_\_. This defendant's residence is in (specify state): \_\_\_\_\_.

**C. RIDE INFORMATION**

1. The Plaintiff was sexually assaulted, harassed, battered, or otherwise attacked by an Uber driver in connection with a ride facilitated on the Uber platform in Cuyahoga County, Ohio on 10/29/2022

2. The Plaintiff was the account holder of the Uber account used to request the relevant ride.

3. The Plaintiff provides the following additional information about the ride:  
☒ The Plaintiff hereby incorporates Plaintiff's disclosure of ride information produced pursuant to Pretrial Order No. 5 ¶ 4 on [N/A] or to be produced in compliance with deadlines set forth in Pretrial Order No. 5 ¶ 4, and any amendments or supplements thereto.

☐ The origin of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The requested destination of the relevant ride was [STREET ADDRESS, CITY, COUNTY, STATE]. The driver was named [DRIVER NAME].

**III. CAUSES OF ACTION ASSERTED**

1. The Causes of Action asserted in the *Plaintiffs' Master Long-Form Complaint*, and the allegations with regard thereto in the *Plaintiffs' Master Long-Form Complaint*, are adopted in this *Short-Form Complaint* by reference, except that Plaintiff opts out of and excludes the causes of action

<sup>3</sup> A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

<sup>4</sup> A limited liability company whose sole member, Uber Technologies, Inc., is a citizen of Delaware and California.

specified below:

Check any EXCLUDED causes of action	Cause of Action Number	Cause of Action
<input type="checkbox"/>	I	NEGLIGENCE (including Negligent Hiring, Retention, Supervision, and Entrustment)
<input type="checkbox"/>	II	FRAUD AND MISREPRESENTATION
<input type="checkbox"/>	III	NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS
<input type="checkbox"/>	IV	COMMON CARRIER'S NON-DELEGABLE DUTY TO PROVIDE SAFE TRANSPORTATION <sup>5</sup>
<input type="checkbox"/>	V	OTHER NON-DELEGABLE DUTIES TO PROVIDE SAFE TRANSPORTATION <sup>6</sup>
<input type="checkbox"/>	VI	VICARIOUS LIABILITY FOR DRIVERS' TORTS - EMPLOYEE
<input type="checkbox"/>	VII	VICARIOUS LIABILITY FOR DRIVERS' TORTS - APPARENT AGENCY
<input type="checkbox"/>	VIII	VICARIOUS LIABILITY FOR DRIVERS' TORTS - RAIFICATION
<input type="checkbox"/>	IX	VICARIOUS LIABILITY FOR DRIVERS' TORTS - Cal. Public Utilities Code S 535
<input type="checkbox"/>	X	STRICT PRODUCTS LIABILITY - DESIGN DEFECT
<input type="checkbox"/>	XI	STRICT PRODUCTS LIABILITY - FAILURE TO WARN
<input type="checkbox"/>	XII	STRICT PRODUCTS LIABILITY - PRODUCT LIABILITY ACTS
<input type="checkbox"/>	XIII	UNFAIR COMPETITION LAW - Cal. Bus. & Prof. Code S 17200 et seq.

## VI. ADDITIONAL CAUSES OF ACTION AND/OR ALLEGATIONS

- Plaintiff asserts the following additional theories against the Defendants designated in paragraph \_\_ above:

<sup>5</sup> This claim is pleaded in the *Plaintiffs' Master Long-Form Complaint* under the laws of every state **except: Arizona, Colorado, District of Columbia, Illinois** (for incidents prior to August 11, 2023), **Michigan, Montana** (for incidents prior to April 23, 2023), **New York, Pennsylvania, Wisconsin, and Wyoming**.

<sup>6</sup> This claim is pleaded in the *Plaintiffs' Master Long-Form Complaint* under the laws of every state **except: District of Columbia, Michigan, New York, Pennsylvania**.

1 [N/A]

2 2. If Plaintiff has additional factual allegations not set forth in *Plaintiffs'*  
3 *Master Long-Form Complaint*, they may be set forth below or in additional  
4 pages:

5  
6 Additional facts will be set forth in Plaintiff Fact Sheet to be submitted to  
7 court at a separate date.

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9 **WHEREFORE**, Plaintiff prays for relief and judgment against Defendants for  
10 economic and non-economic compensatory and punitive and exemplary damages, together  
11 with interest, costs of suit, attorneys' fees, and all such other relief as the Court deems  
12 proper, and such further relief as the Court deems equitable and just, and as set forth in  
13 *Plaintiffs' Master Long-Form Complaint*.

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15 **JURY DEMAND**

16 Plaintiff hereby demands a trial by jury as to all claims in this action.

17  
18 Dated: January 3, 2025

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20 By: /s/Sarah Anastasi  
21 Sarah Anastasi, Esq.  
22 Attorney for Plaintiff  
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